

Message

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**From:** Jones, Russell [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4795FDC630C34BE4AED0C6416A20D606-RUSSELL JONES]  
**Sent:** 2/7/2019 7:58:56 PM  
**To:** McNally, Robert [McNally.Robert@epa.gov]  
**Subject:** RE: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

She has been made aware of the situation.

She said that we can reconcile all of the comments on Monday. I think that she cc:ed you on her reply to my "heads-up."

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**From:** McNally, Robert  
**Sent:** Thursday, February 07, 2019 2:56 PM  
**To:** Jones, Russell <Jones.Russell@epa.gov>  
**Subject:** RE: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

I am glad that you caught this.

## Ex. 5 Deliberative Process (DP)

Thanks

bob

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**From:** Jones, Russell  
**Sent:** Thursday, February 07, 2019 2:50 PM  
**To:** McNally, Robert <McNally.Robert@epa.gov>  
**Subject:** RE: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

## Ex. 5 Deliberative Process (DP)

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**From:** McNally, Robert  
**Sent:** Thursday, February 07, 2019 2:48 PM  
**To:** Jones, Russell <Jones.Russell@epa.gov>  
**Subject:** FW: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

Did she send the wrong version? Was it an earlier version?

Bob

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**From:** Jones, Russell

**Sent:** Thursday, February 07, 2019 2:35 PM

**To:** Chun, Melissa <[Chun.Melissa@epa.gov](mailto:Chun.Melissa@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>

**Subject:** RE: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

Melissa/Bob:

## Ex. 5 Deliberative Process (DP)

Russ J

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**From:** Chun, Melissa

**Sent:** Thursday, February 07, 2019 2:29 PM

**To:** Jones, Russell <[Jones.Russell@epa.gov](mailto:Jones.Russell@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>

**Subject:** FW: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

Here's TJ's mark-up of the guidance document.

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**From:** Wyatt, TJ

**Sent:** Friday, February 01, 2019 12:17 PM

**To:** Chun, Melissa <[Chun.Melissa@epa.gov](mailto:Chun.Melissa@epa.gov)>; Jones, Russell <[Jones.Russell@epa.gov](mailto:Jones.Russell@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>; Varco, Joseph <[varco.joseph@epa.gov](mailto:varco.joseph@epa.gov)>; Gsell, Alyssa <[Gsell.Alyssa@epa.gov](mailto:Gsell.Alyssa@epa.gov)>; Kaczmarek, Chris <[Kaczmarek.Chris@epa.gov](mailto:Kaczmarek.Chris@epa.gov)>; Ambrosino, Helene <[Ambrosino.Helene@epa.gov](mailto:Ambrosino.Helene@epa.gov)>; VanAkkeren, Brett <[VanAkkeren.Brett@epa.gov](mailto:VanAkkeren.Brett@epa.gov)>; Hofmann, Angela <[Hofmann.Angela@epa.gov](mailto:Hofmann.Angela@epa.gov)>; Chumble, Prasad <[Chumble.Prasad@epa.gov](mailto:Chumble.Prasad@epa.gov)>; Smoot, Cameo <[Smoot.Cameo@epa.gov](mailto:Smoot.Cameo@epa.gov)>; Watkins, Stephen <[watkins.stephen@epa.gov](mailto:watkins.stephen@epa.gov)>; Hoyt, Sarita <[Hoyt.Sarita@epa.gov](mailto:Hoyt.Sarita@epa.gov)>; Mosby, Jackie <[Mosby.Jackie@epa.gov](mailto:Mosby.Jackie@epa.gov)>; Miller, Wynne <[Miller.Wynne@epa.gov](mailto:Miller.Wynne@epa.gov)>

**Cc:** Kiely, Timothy <[Kiely.Timothy@epa.gov](mailto:Kiely.Timothy@epa.gov)>

**Subject:** RE: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

Hi!

## Ex. 5 Deliberative Process (DP)

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**From:** Chun, Melissa

**Sent:** Tuesday, January 29, 2019 3:23 PM

**To:** Jones, Russell <[Jones.Russell@epa.gov](mailto:Jones.Russell@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>; Varco, Joseph <[varco.joseph@epa.gov](mailto:varco.joseph@epa.gov)>; Gsell, Alyssa <[Gsell.Alyssa@epa.gov](mailto:Gsell.Alyssa@epa.gov)>; Kaczmarek, Chris <[Kaczmarek.Chris@epa.gov](mailto:Kaczmarek.Chris@epa.gov)>; Ambrosino, Helene <[Ambrosino.Helene@epa.gov](mailto:Ambrosino.Helene@epa.gov)>; VanAkkeren, Brett <[VanAkkeren.Brett@epa.gov](mailto:VanAkkeren.Brett@epa.gov)>; Wyatt, TJ <[Wyatt.TJ@epa.gov](mailto:Wyatt.TJ@epa.gov)>; Hofmann, Angela <[Hofmann.Angela@epa.gov](mailto:Hofmann.Angela@epa.gov)>; Chumble, Prasad <[Chumble.Prasad@epa.gov](mailto:Chumble.Prasad@epa.gov)>; Smoot, Cameo <[Smoot.Cameo@epa.gov](mailto:Smoot.Cameo@epa.gov)>; Watkins, Stephen <[watkins.stephen@epa.gov](mailto:watkins.stephen@epa.gov)>; Hoyt, Sarita <[Hoyt.Sarita@epa.gov](mailto:Hoyt.Sarita@epa.gov)>; Mosby, Jackie <[Mosby.Jackie@epa.gov](mailto:Mosby.Jackie@epa.gov)>; Miller, Wynne <[Miller.Wynne@epa.gov](mailto:Miller.Wynne@epa.gov)>  
**Subject:** FW: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

Hi all,

Welcome back.

Here's where we left off on biostimulants:

## Ex. 5 Deliberative Process (DP)

Thanks!

-Melissa

**From:** Jones, Russell

**Sent:** Wednesday, December 19, 2018 7:32 AM

**To:** Chun, Melissa <[Chun.Melissa@epa.gov](mailto:Chun.Melissa@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>; Varco, Joseph <[varco.joseph@epa.gov](mailto:varco.joseph@epa.gov)>; Gsell, Alyssa <[Gsell.Alyssa@epa.gov](mailto:Gsell.Alyssa@epa.gov)>; Kaczmarek, Chris <[Kaczmarek.Chris@epa.gov](mailto:Kaczmarek.Chris@epa.gov)>; Ambrosino, Helene <[Ambrosino.Helene@epa.gov](mailto:Ambrosino.Helene@epa.gov)>; VanAkkeren, Brett <[VanAkkeren.Brett@epa.gov](mailto:VanAkkeren.Brett@epa.gov)>; Wyatt, TJ <[Wyatt.TJ@epa.gov](mailto:Wyatt.TJ@epa.gov)>; Hofmann, Angela <[Hofmann.Angela@epa.gov](mailto:Hofmann.Angela@epa.gov)>; Chumble, Prasad <[Chumble.Prasad@epa.gov](mailto:Chumble.Prasad@epa.gov)>; Smoot, Cameo <[Smoot.Cameo@epa.gov](mailto:Smoot.Cameo@epa.gov)>; Watkins, Stephen <[watkins.stephen@epa.gov](mailto:watkins.stephen@epa.gov)>; Hoyt, Sarita <[Hoyt.Sarita@epa.gov](mailto:Hoyt.Sarita@epa.gov)>; Mosby, Jackie <[Mosby.Jackie@epa.gov](mailto:Mosby.Jackie@epa.gov)>; Miller, Wynne <[Miller.Wynne@epa.gov](mailto:Miller.Wynne@epa.gov)>

**Subject:** RE: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

### Ex. 5 Deliberative Process (DP)

Russell S. Jones, Ph.D., Senior Scientist  
Chair, Biochemical Classification Committee  
Risk Assessment Branch  
Biopesticides & Pollution Prevention Division  
Office of Pesticide Programs  
US Environmental Protection Agency

P: 703-308-5071; F: 703-308-7026

[jones.russell@epa.gov](mailto:jones.russell@epa.gov)

Office Location:  
One Potomac Yard  
2777 South Crystal Drive Arlington, VA 22202

Mailing Address:  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001  
<http://www.epa.gov/pesticides>



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**From:** Chun, Melissa

**Sent:** Tuesday, December 18, 2018 5:39 PM

**To:** Jones, Russell <[Jones.Russell@epa.gov](mailto:Jones.Russell@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>; Varco, Joseph <[varco.joseph@epa.gov](mailto:varco.joseph@epa.gov)>; Gsell, Alyssa <[Gsell.Alyssa@epa.gov](mailto:Gsell.Alyssa@epa.gov)>; Kaczmarek, Chris <[Kaczmarek.Chris@epa.gov](mailto:Kaczmarek.Chris@epa.gov)>; Ambrosino, Helene <[Ambrosino.Helene@epa.gov](mailto:Ambrosino.Helene@epa.gov)>; VanAkkeren, Brett <[VanAkkeren.Brett@epa.gov](mailto:VanAkkeren.Brett@epa.gov)>; Wyatt, TJ <[Wyatt.Tj@epa.gov](mailto:Wyatt.Tj@epa.gov)>; Hofmann, Angela <[Hofmann.Angela@epa.gov](mailto:Hofmann.Angela@epa.gov)>; Chumble, Prasad <[Chumble.Prasad@epa.gov](mailto:Chumble.Prasad@epa.gov)>; Smoot, Cameo <[Smoot.Cameo@epa.gov](mailto:Smoot.Cameo@epa.gov)>; Watkins, Stephen <[watkins.stephen@epa.gov](mailto:watkins.stephen@epa.gov)>; Hoyt, Sarita <[Hoyt.Sarita@epa.gov](mailto:Hoyt.Sarita@epa.gov)>; Mosby, Jackie <[Mosby.Jackie@epa.gov](mailto:Mosby.Jackie@epa.gov)>; Miller, Wynne <[Miller.Wynne@epa.gov](mailto:Miller.Wynne@epa.gov)>

**Subject:** FW: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

Hi all,

## Ex. 5 Deliberative Process (DP)

-Melissa

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**From:** Chun, Melissa

**Sent:** Tuesday, December 18, 2018 11:55 AM

**To:** Jones, Russell <[Jones.Russell@epa.gov](mailto:Jones.Russell@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>; Varco, Joseph <[varco.joseph@epa.gov](mailto:varco.joseph@epa.gov)>; Ambrosino, Helene <[Ambrosino.Helene@epa.gov](mailto:Ambrosino.Helene@epa.gov)>; Gsell, Alyssa <[Gsell.Alyssa@epa.gov](mailto:Gsell.Alyssa@epa.gov)>; VanAkkeren, Brett <[VanAkkeren.Brett@epa.gov](mailto:VanAkkeren.Brett@epa.gov)>; Wyatt, TJ <[Wyatt.Tj@epa.gov](mailto:Wyatt.Tj@epa.gov)>; Hofmann, Angela <[Hofmann.Angela@epa.gov](mailto:Hofmann.Angela@epa.gov)>; Chumble, Prasad <[Chumble.Prasad@epa.gov](mailto:Chumble.Prasad@epa.gov)>; Smoot, Cameo <[Smoot.Cameo@epa.gov](mailto:Smoot.Cameo@epa.gov)>;

Watkins, Stephen <[watkins.stephen@epa.gov](mailto:watkins.stephen@epa.gov)>; Hoyt, Sarita <[Hoyt.Sarita@epa.gov](mailto:Hoyt.Sarita@epa.gov)>; Mosby, Jackie <[Mosby.Jackie@epa.gov](mailto:Mosby.Jackie@epa.gov)>; Miller, Wynne <[Miller.Wynne@epa.gov](mailto:Miller.Wynne@epa.gov)>

**Subject:** FW: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

Hi all,

I talked with Danielle about the biostimulants guidance during our bi-weekly meeting this morning.

## Ex. 5 Deliberative Process (DP)

I'm attaching a revised version of the FR Notice.

Thanks!

-Melissa

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**From:** Gsell, Alyssa

**Sent:** Monday, December 17, 2018 4:04 PM

**To:** Chun, Melissa <[Chun.Melissa@epa.gov](mailto:Chun.Melissa@epa.gov)>; Jones, Russell <[Jones.Russell@epa.gov](mailto:Jones.Russell@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>; Varco, Joseph <[varco.joseph@epa.gov](mailto:varco.joseph@epa.gov)>; Ambrosino, Helene <[Ambrosino.Helene@epa.gov](mailto:Ambrosino.Helene@epa.gov)>; VanAkkeren, Brett <[VanAkkeren.Brett@epa.gov](mailto:VanAkkeren.Brett@epa.gov)>; Wyatt, TJ <[Wyatt.Tj@epa.gov](mailto:Wyatt.Tj@epa.gov)>; Hofmann, Angela <[Hofmann.Angela@epa.gov](mailto:Hofmann.Angela@epa.gov)>; Chumble, Prasad <[Chumble.Prasad@epa.gov](mailto:Chumble.Prasad@epa.gov)>; Smoot, Cameo <[Smoot.Cameo@epa.gov](mailto:Smoot.Cameo@epa.gov)>; Watkins, Stephen <[watkins.stephen@epa.gov](mailto:watkins.stephen@epa.gov)>; Hoyt, Sarita <[Hoyt.Sarita@epa.gov](mailto:Hoyt.Sarita@epa.gov)>; Mosby, Jackie <[Mosby.Jackie@epa.gov](mailto:Mosby.Jackie@epa.gov)>

**Subject:** RE: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

## Ex. 5 Attorney Client (AC)

Alyssa M. Gsell

US EPA Office of General Counsel

Phone: 202-564-7413

Fax: 202-564-5416

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**From:** Chun, Melissa

**Sent:** Sunday, December 16, 2018 6:49 PM

**To:** Jones, Russell <[Jones.Russell@epa.gov](mailto:Jones.Russell@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>; Varco, Joseph <[varco.joseph@epa.gov](mailto:varco.joseph@epa.gov)>; Ambrosino, Helene <[Ambrosino.Helene@epa.gov](mailto:Ambrosino.Helene@epa.gov)>; Gsell, Alyssa <[Gsell.Alyssa@epa.gov](mailto:Gsell.Alyssa@epa.gov)>; VanAkkeren, Brett <[VanAkkeren.Brett@epa.gov](mailto:VanAkkeren.Brett@epa.gov)>; Wyatt, TJ <[Wyatt.Tj@epa.gov](mailto:Wyatt.Tj@epa.gov)>; Hofmann, Angela <[Hofmann.Angela@epa.gov](mailto:Hofmann.Angela@epa.gov)>; Chumble, Prasad <[Chumble.Prasad@epa.gov](mailto:Chumble.Prasad@epa.gov)>; Smoot, Cameo <[Smoot.Cameo@epa.gov](mailto:Smoot.Cameo@epa.gov)>; Watkins, Stephen <[watkins.stephen@epa.gov](mailto:watkins.stephen@epa.gov)>; Hoyt, Sarita <[Hoyt.Sarita@epa.gov](mailto:Hoyt.Sarita@epa.gov)>; Mosby, Jackie <[Mosby.Jackie@epa.gov](mailto:Mosby.Jackie@epa.gov)>

**Subject:** FW: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

Hi all,

Here's the mark-up for the FR Notice.

## Ex. 5 Deliberative Process (DP)

Please forward your comments to everyone on this e-mail.

Thanks!

-Melissa

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**From:** Chun, Melissa

**Sent:** Friday, December 14, 2018 12:08 PM

**To:** Jones, Russell <[Jones.Russell@epa.gov](mailto:Jones.Russell@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>; Varco, Joseph <[varco.joseph@epa.gov](mailto:varco.joseph@epa.gov)>; Ambrosino, Helene <[Ambrosino.Helene@epa.gov](mailto:Ambrosino.Helene@epa.gov)>; Gsell, Alyssa <[Gsell.Alyssa@epa.gov](mailto:Gsell.Alyssa@epa.gov)>; VanAkkeren, Brett <[VanAkkeren.Brett@epa.gov](mailto:VanAkkeren.Brett@epa.gov)>; Hofmann, Angela <[Hofmann.Angela@epa.gov](mailto:Hofmann.Angela@epa.gov)>; Chumble, Prasad <[Chumble.Prasad@epa.gov](mailto:Chumble.Prasad@epa.gov)>; Smoot, Cameo <[Smoot.Cameo@epa.gov](mailto:Smoot.Cameo@epa.gov)>; Watkins, Stephen <[watkins.stephen@epa.gov](mailto:watkins.stephen@epa.gov)>; Hoyt, Sarita <[Hoyt.Sarita@epa.gov](mailto:Hoyt.Sarita@epa.gov)>; Mosby, Jackie <[Mosby.Jackie@epa.gov](mailto:Mosby.Jackie@epa.gov)>

**Subject:** FW: FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

We walked through the comments, made assignments, and flagged one that will need to be raised to the DAA's.

## Ex. 5 Deliberative Process (DP)

We'll send the mark-ups around on Monday for folks to comment on.

## Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

After we've agreed on the responses/edits, the documents will go to Rick and the DAA's on Tuesday for their approval, before sending the responses to OMB.

Please note that there might be a second set of comments from USDA next Tuesday.

Thanks everyone!

-Melissa

**Melissa L Chun** | US EPA | Regulatory and Information Coordination Staff | Office of Chemical Safety and Pollution Prevention | 1200 Pennsylvania Ave., NW | William Jefferson Clinton Building East Room 3425E, Mail Code 7101M | Washington DC 20460 | phone: (202) 564-1605

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**From:** Chun, Melissa

**Sent:** Friday, December 14, 2018 9:35 AM

**To:** Jones, Russell <[Jones.Russell@epa.gov](mailto:Jones.Russell@epa.gov)>; McNally, Robert <[McNally.Robert@epa.gov](mailto:McNally.Robert@epa.gov)>; Varco, Joseph <[varco.joseph@epa.gov](mailto:varco.joseph@epa.gov)>; Ambrosino, Helene <[Ambrosino.Helene@epa.gov](mailto:Ambrosino.Helene@epa.gov)>; Gsell, Alyssa <[Gsell.Alyssa@epa.gov](mailto:Gsell.Alyssa@epa.gov)>; VanAkkeren, Brett <[VanAkkeren.Brett@epa.gov](mailto:VanAkkeren.Brett@epa.gov)>; Hofmann, Angela <[Hofmann.Angela@epa.gov](mailto:Hofmann.Angela@epa.gov)>; Chumble, Prasad <[Chumble.Prasad@epa.gov](mailto:Chumble.Prasad@epa.gov)>; Smoot, Cameo <[Smoot.Cameo@epa.gov](mailto:Smoot.Cameo@epa.gov)>; Watkins, Stephen <[watkins.stephen@epa.gov](mailto:watkins.stephen@epa.gov)>; Hoyt, Sarita <[Hoyt.Sarita@epa.gov](mailto:Hoyt.Sarita@epa.gov)>

**Subject:** FROM OMB: EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21) - Interagency Comments

Hi all,

Here are the interagency reviewer comments from OMB.

We go through them at 11 am.

-Melissa

**Melissa L Chun** | US EPA | Regulatory and Information Coordination Staff | Office of Chemical Safety and Pollution Prevention | 1200 Pennsylvania Ave., NW | William Jefferson Clinton Building East Room 3425E, Mail Code 7101M | Washington DC 20460 | phone: (202) 564-1605

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**From:** Jones, Danielle Y. EOP/OMB <[Danielle\\_Y\\_Jones@omb.eop.gov](mailto:Danielle_Y_Jones@omb.eop.gov)>

**Sent:** Friday, December 14, 2018 9:29 AM

**To:** Chun, Melissa <[Chun.Melissa@epa.gov](mailto:Chun.Melissa@epa.gov)>

**Cc:** Hofmann, Angela <[Hofmann.Angela@epa.gov](mailto:Hofmann.Angela@epa.gov)>; VanAkkeren, Brett <[VanAkkeren.Brett@epa.gov](mailto:VanAkkeren.Brett@epa.gov)>

**Subject:** EO 12866 Interagency Review: EPA's Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21)

Good morning Melissa,

Please find attached the interagency reviewers comments on the Guidance for Plant Biostimulant Products: Label Claims Excluded or Regulated under FIFRA as Plant Regulator Claims (RIN 2070-ZA21).

Please let me know if you have any questions.

Best,  
Danielle

Danielle Y. Jones  
Senior Policy Analyst  
Office of Management and Budget  
Phone: (202) 395-1741 | [djones@omb.eop.gov](mailto:djones@omb.eop.gov)